

NOV 28 2018

UNITED STATES DISTRICT COURT

for the

Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*
 a LG brand cell phone associated
 with telephone number 206-822-5522

Case No.

MJ18-545

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A, attached and incorporated herein.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, attached and incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 922(g)(1)	Felon in Possession of a Firearm
21 U.S.C. 841(a)(1)	Distribution/Possession w/Intent to Distribute Controlled Substances

The application is based on these facts:

Please see Affidavit of Special Agent Gregory Heller (ATF)

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Special Agent Gregory Heller (ATF)

Printed name and title



Judge's signature

Hon. James P. Donohue, United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/28/2018

City and state: Seattle, Washington

AFFIDAVIT

STATE OF WASHINGTON)
COUNTY OF KING) ss

I, Gregory Heller, a Special Agent/Task Force Officer with the Federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), in Seattle, Washington, having been duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a special agent (SA) duly sworn and employed by the U.S.

Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I am currently assigned to the Seattle V ATF Field Office, located within the Seattle, Washington, Field Division. I have been employed as a special agent since September 2014. Prior to this employment, I was employed as a police officer and detective for Gwinnett County, Georgia, from 2007 to 2014. In total, I have approximately eleven years of state and federal law enforcement experience.

2. I am a graduate of Duke University in Durham, North Carolina, where I received a Bachelor of Science in Engineering (B.S.E.) in Civil Engineering. I completed a twelve-week Criminal Investigator Training Program (CITP) and a fourteen-week Special Agent Basic Training (SABT) at the ATF National Academy/Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. I also completed a 23-week Gwinnett County Police Training Academy and was a Peace Officer Standards and Training (P.O.S.T.) certified peace officer in the State of Georgia.

3. I am responsible for investigations involving specified unlawful activities, to include violent crimes involving firearms that occur in the Western District of Washington. I am also responsible for enforcing federal firearms and explosives laws and related statutes in the Western District of Washington. I received training on the proper investigative techniques for these violations, including the identification of firearms and location of the firearms' manufacture. I have actively participated in investigations of

1 criminal activity, including but not limited to: crimes against persons, crimes against
 2 property, narcotics-related crimes, and crimes involving the possession, use, theft, or
 3 transfer of firearms. During these investigations, I have also participated in the execution
 4 of search warrants and the seizure of evidence indicating the commission of criminal
 5 violations. As a law enforcement officer, I have testified under oath, affirmed to
 6 applications of search and arrest warrants, and obtained electronic monitoring orders.

7 **PURPOSE OF AFFIDAVIT**

8 4. This Affidavit is submitted in support of an application to search a cellular
 9 phone (hereinafter "**SUBJECT DEVICE**"), described in Attachment A, attached hereto
 10 and incorporated by this reference as if set forth fully herein. As further explained below,
 11 The **SUBJECT DEVICE** was recovered from subject LORENZO BELL's bedroom
 12 during execution of a search warrant. Furthermore, Seattle Police Detective William
 13 Miller confirmed that the phone number associated with the **SUBJECT DEVICE** is 206-
 14 822-5522, which is the same number that BELL provided to a confidential informant (CI)
 15 after a controlled purchase of narcotics.

16 5. The **SUBJECT DEVICE** is a black and blue LG brand Model LM-
 17 X212TA cellular phone with serial number 804CYYQ025962 and IMEI number 356351-
 18 09-025962-0 that was associated with phone number 206-822-5522. The **SUBJECT**
 19 **DEVICE** was entered into Seattle Police Department evidence as tag number 830840-3
 20 and later transferred to ATF Evidence under case 787095-19-0010 as Item #0004.

21 6. The **SUBJECT DEVICE** is currently in the custody of ATF and is secured
 22 in the ATF Seattle V Field Office evidence vault in Seattle, Washington.

23 7. As set forth below, there is probable cause to believe that the **SUBJECT**
 24 **DEVICE** contains evidence, fruits and instrumentalities of the following crimes: felon in
 25 possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1),
 26 and distribution and possession with intent to distribute controlled substances in violation
 27 of Title 21, United States Code, Section 841(a)(1), as further described in Attachment B,
 28 attached hereto and incorporated by this reference as if set forth fully herein.

8. The information set forth in this Affidavit consists of information I have gathered and observed firsthand through the course of this investigation to date, as well as information relayed to me by other law enforcement officers, my review of law enforcement reports, and interviews of witnesses. Since this Affidavit is being submitted for the limited purpose of obtaining a search warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for the issuance of such warrant.

SUMMARY OF INVESTIGATION

A. Background.

9. Seattle Police Detective William Miller has advised me of the following. In June 2018, personnel assigned to SPD's West Precinct noticed an uptick in narcotics related activity in the vicinity of the King County Courthouse. These personnel created a plan to target this activity and reached out to SPD's Narcotics unit for assistance. Detective Miller was assigned this project and began to do background research on a provided list of known narcotic traffickers in the area.

10. Detective Miller conducted his own surveillance of the area around the King County Courthouse (516 3rd Avenue South) and observed the immense amount of narcotics activity. Detective Miller observed numerous known drug traffickers standing and parking vehicles near the courthouse to sell narcotics. He observed dealers arrive at varying hours of the day and remain there whilst foot and vehicular traffic arrive to purchase narcotics.

11. During this surveillance, Detective Miller observed a consistent dealer arrive and park at the intersection of 3rd Avenue and Yesler Street in downtown Seattle. This dealer is LORENZO H. BELL (DOB XX-XX-1945). Detective Miller was able to identify BELL by sight after researching known narcotics traffickers in the downtown core. According to Detective Miller, BELL typically arrived to the Third and Yesler area around 9:00 a.m.. This time coincided with the nearby Lazarus center breakfast service, which provides meals to homeless individuals.

1 12. On June 27, 2018, around 9:30 a.m., Detective Miller observed BELL
2 parked at Third and Yesler. Throughout the surveillance, BELL was observed making
3 transactions in his vehicle, bearing Washington license plate AWE4811. Numerous
4 individuals would sit in BELL's vehicle for a short time and exchange items. This is
5 indicative of narcotics trafficking.

6 13. On June 29, 2018, at 8:42 a.m., Undercover SPD Detective Chin
7 (hereinafter referred to as a "UC") contacted BELL while BELL was parked at Third and
8 Yesler. BELL directed the UC to another dealer for the purchase of crack cocaine. BELL
9 did not want to sell to the UC because of the small amount of crack cocaine the UC asked
10 to purchase. After BELL facilitated this sale, he was observed by detectives making
11 several contacts with individuals inside his tan Mercedes Benz 420 bearing Washington
12 license plate AWE4811.

13 14. On July 5, 2018, BELL was observed parked near Third and Yesler in the
14 morning. BELL was observed making contacts with customers in his vehicle. Undercover
15 Detective Chin was sent to purchase narcotics from BELL. The UC spoke with BELL
16 through the passenger window, which was rolled down. BELL instructed the UC to get
17 inside the vehicle. The UC then sat in the car with the door open, to which BELL said "I
18 don't do business this way, close the door." The UC attempted again to purchase crack
19 cocaine from BELL, but BELL would not sell crack while the door to the Mercedes Benz
20 was open.

21 15. On July 13, 2018, detectives observed BELL leave his apartment complex
22 (The Madison Apartments) at approximately 9:30 a.m. and drive his Mercedes Benz to
23 the 400 Block of Second Avenue Extension South in Seattle. Upon arriving in this area,
24 BELL exited the vehicle and went to the trunk where he removed a small backpack or
25 satchel. BELL remained in this block for an extended period of time before detectives left
26 for another operation.

27 16. SPD used a confidential informant (CI) during this investigation. The CI
28 has worked with law enforcement in other investigations, which led to arrests and

1 prosecutions for drug-related crimes. The CI was paid for his/her work with on this
2 investigation, including the controlled purchase of cocaine from BELL described in
3 greater detail below.¹

4 17. On July 28, 2018, the CI called and stated BELL was observed driving a
5 newer 7-series BMW around Pioneer Square. The CI stated he/she observed BELL
6 dealing from this vehicle.

7 18. BELL was observed parked in the 200 block of Yesler Street sitting in a
8 silver BMW 745 bearing Washington license plate BJL2129. The bill of sale on this car
9 read as follows:

10 NOTIFICATIONS
11 THIS VEHICLE HAS BEEN SOLD.
12 SLD/07-13-2018.
13 NAM/BELL, LORENZO.
14 STR/823 MADISON ST
15 APT 301.
16 CIT/SEATTLE.STA/WA.ZIP/98104

17 19. In the week before July 31, 2018, on a date and time known to Detective
18 Miller and not further detailed to avoid revealing the CI's identity, detectives met the
19 above-listed CI at a pre-determined meeting location in Seattle. The CI was searched for
20 narcotics, paraphernalia, currency and weapons. The CI was free from the listed items.
21 The CI was given pre-recorded buy money and instructed to purchase narcotics from
22 BELL.

23 20. Detectives monitored the apartment complex at 823 Madison Street in
24 Seattle (The Madison Apartments). Through a conversation with BELL's apartment
25 manager, detectives confirmed that BELL lived in unit 301. Detectives observed BELL's
26 Mercedes Benz, bearing Washington license plate AWE4811, parked on Ninth Avenue
27 just south of Madison Street. This is the east side of the apartment complex. Detectives

28 ¹ For purposes of this affidavit, the Court can assume that the CI has one criminal conviction within the past ten years, for a drug offense, as well as older convictions for Assault 4 - DV (2001), DWI (1999), Reckless Driving (1990), Damage Property (1990), Dangerous Drugs (1989), and Larceny (1989).

1 observed BELL leave the front door of the apartment complex carrying a small backpack
2 or satchel. This backpack was placed in the trunk of the vehicle before BELL left the
3 parking space. BELL walked to the Mercedes Benz and drove to Pioneer Square. BELL
4 remained in the driver seat of the parked vehicle.

5 21. Once BELL parked, the CI traveled to BELL. The CI did not contact
6 anyone and was under constant observation by detectives. The CI entered the passenger
7 seat of the car and purchased crack cocaine from BELL. The CI then left BELL and went
8 to a pre-determined meet location where he/she met with detectives. While the CI
9 traveled to this location he/she did not stop or contact anyone.

10 22. Once at the meet location, the CI handed over a quantity of narcotics which
11 contained suspected crack cocaine. The CI and their property were again searched for
12 narcotics, paraphernalia, currency and weapons. Again, the CI was free of the listed
13 items. The quantities of narcotics and price for them are known to Detective Miller and
14 not further detailed to avoid revealing the CI's identity.

15 23. The CI stated he/she briefly spoke with BELL, whom he/she knows by the
16 street name of "Mustafa." BELL gave his phone number to the CI for future transactions.
17 The CI provided "Mustafa's" phone number as 206-822-5522.

18 24. Detective Miller showed the CI a picture of BELL, and the CI confirmed
19 the photograph as the person he/she knows as "Mustafa." There were no identifying
20 marks on the photograph presented to the CI. The CI was released and the listed crack
21 cocaine was transported to the Seattle Police Department for further processing.

22 25. Detective Miller conducted a field test on the suspected narcotics in
23 accordance with the protocols established by the Washington State Patrol Crime
24 Laboratory (WSPCL). He used the appropriate NIK field tester "G" to conduct the test
25 and received positive results for the presence of crack cocaine. The crack cocaine was
26 placed into evidence.

27 **B. BELL's Arrest on August 3, 2018.**

28

1 26. On July 31, 2018, Detective Miller applied for a search warrant for BELL's
2 apartment unit, one of BELL's vehicles (the Mercedes Benz), and BELL's person. King
3 County Superior Court Judge Kristin Richardson issued the warrant.

4 27. On August 3, 2018, at about 6:45 a.m., BELL was arrested at First and
5 Cherry in downtown Seattle, after leaving his apartment in his BMW. Arresting officers
6 searched BELL and located a sandwich bag of crack cocaine, an Altoids tin with several
7 rocks of crack cocaine packaged for resale, and \$190 in cash. BELL was transported to
8 the West Precinct.

9 28. Investigators weighed the suspected crack cocaine recovered from BELL's
10 person, which weighed 27.5 grams and 1.5 grams respectively. The substances field-
11 tested positive for cocaine.

12 **C. Search of BELL's Apartment on August 3, 2018.**

13 29. At about 8:00 a.m., SPD's South Precinct Anti-Crime Team (ACT) served
14 the search warrant at 823 Madison ST, unit 301, and the Mercedes Benz bearing
15 Washington license plate AWE4811. The officers found a female, E.B., inside the
16 apartment. Officers searched the apartment and located an Interarms Star 9mm
17 semiautomatic pistol bearing serial number 1603272 on BELL's bed. The pistol had a
18 loaded magazine inserted, with an empty chamber. A second loaded 9mm magazine for
19 the pistol was located in a bag in the bedroom.

20 30. A small amount of crack cocaine and \$36 cash were also recovered from
21 the apartment, along with paperwork in BELL's name. The **SUBJECT DEVICE** was
22 also located in BELL's bedroom, next to BELL's bed. Detective Miller called 206-822-
23 5522, the phone number provided by the CI, and the **SUBJECT DEVICE** rang.

24 **D. BELL's Criminal History.**

25 31. I have reviewed BELL's National Crime Information Center (NCIC)
26 criminal history record and confirmed that BELL has been convicted of at least nine
27 felonies in the State of Washington, including a conviction for *Conspiracy to Commit a*
28 *Violation of the Uniform Controlled Substances Act: Deliver Cocaine*, in King County

1 Superior Court, Washington, under cause number 17-1-04705-4, dated on or about April
2 13, 2018. In Washington, a felony crime is punishable by a term of imprisonment
3 exceeding one year.

4 **E. Interstate Nexus Examination of Firearms.**

5 32. ATF Special Agent (SA) Oliver Mullins has been trained and is considered
6 an expert in the recognition of firearms and ammunition and their origin of manufacture.
7 After examining the Interarms Star 9mm pistol recovered in this case, SA Mullins
8 determined that this firearm was not manufactured in the State of Washington and
9 therefore had traveled in interstate or foreign commerce prior to being possessed in the
10 State of Washington.

11 **USE OF CELLULAR DEVICES IN DRUG TRAFFICKING**

12 33. As a result of my training and experience, and based on my consultation
13 with other agents and law enforcement officers, I have an understanding of the manner in
14 which narcotics are distributed and the various roles played by individuals and groups in
15 their distribution. I have encountered and have become familiar with various tools,
16 methods, trends, paraphernalia, and related articles utilized by various traffickers in their
17 efforts to import, conceal, and distribute controlled substances. I am also familiar with the
18 manner in which drug traffickers use telephones, often cellular telephones, to conduct
19 their unlawful operations. I am also familiar with the manner in which drug traffickers
20 will use weapons to protect their drug activities and further its goals.

21 34. Based upon my training, experience, and conversations with other
22 experienced officers and agents, I know that:

- 23 a. Drug trafficking conspiracies usually take place over several months or
24 years, and continue to operate even when enforcement activity results in
25 arrests and/or seizures of drugs and/or money.
- 26 b. Persons involved in the distribution of controlled substances typically will
27 obtain and distribute drugs on a regular basis, much as a distributor of a
28 legal commodity would purchase stock for sale. Similarly, such drug

1 dealers will maintain an “inventory,” which will fluctuate in size depending
2 upon the demand for and the available supply of the product.

- 3 c. Those involved in the distribution of illicit drugs often communicate by
4 telephone in connection with their illegal activities in order to set up
5 meetings with coconspirators, conduct drug transactions, or to arrange for
6 the transportation drugs or drug proceeds.
- 7 d. Drug traffickers often document aspects of their criminal conduct through
8 photographs or videos of themselves, their associates, their property, and
9 their product. Drug traffickers usually maintain these photographs or videos
10 in their possession.
- 11 e. Drug traffickers routinely change telephone numbers in an attempt to
12 thwart law enforcement. When certain members of a drug trafficking
13 organization change their telephone numbers, they typically call other
14 members to alert them of the telephone number change.
- 15 f. Those involved in the distribution of illicit drugs often travel by car in
16 connection with their illegal activities in order to meet with coconspirators,
17 conduct drug transactions, or to transport drugs or drug proceeds.
- 18 g. Drug traffickers commonly have in their possession, that is, on their person,
19 at their residences, stash houses, storage units, garages, outbuildings and/or
20 vehicles, firearms, ammunition, and other weapons, which are used to
21 protect and secure their property. Persons who purchase and possess
22 firearms also tend to maintain the firearms and ammunition for lengthy
23 periods of time. Firearms can be acquired both legally and unlawfully,
24 without official / traceable documentation. Persons who acquire firearms
25 from Federal Firearms Licensees, through deliberated fraud and
26 concealment, often will also acquire firearms from private parties and other
27 sources unknown to ATF. Firearms or ammunition are often secreted at
28 other locations within their residential curtilage, and the identification of

1 these firearms will assist in establishing their origins. Persons who
2 purchase, possess, sell and/or trade firearms or ammunition commonly
3 maintain documents and items that are related to the purchase, ownership,
4 possession, sale and/or transfer of firearms, ammunition, and/or firearm
5 parts, including but not limited to driver's licenses, telephone records,
6 telephone bills, address and telephone books, canceled checks, receipts,
7 bank records and other financial documentation on the owner's person, at
8 the owner's residence, or in vehicles that they own, use, or have access to.

9 h. Drug dealers use cellular telephones as a tool or instrumentality in
10 committing their criminal activity. They use them to maintain contact with
11 their suppliers, distributors, and customers. They prefer cellular telephones
12 because, first, they can be purchased without the location and personal
13 information that land lines require. Second, they can be easily carried to
14 permit the user maximum flexibility in meeting associates, avoiding police
15 surveillance, and traveling to obtain or distribute drugs. Third, they can be
16 passed between members of a drug conspiracy to allow substitution when
17 one member leaves the area temporarily. Since cellular phone use became
18 widespread, most of the drug dealers I have encountered have used cellular
19 telephone for their drug businesses. I also know that it is common for drug
20 traffickers to retain in their possession phones that they previously used, but
21 have discontinued actively using, for their drug trafficking business. Based
22 on my training and experience, the data maintained in a cellular telephone
23 used by a drug dealer is evidence of a crime or crimes. This includes the
24 following:

25 i. The assigned number to the cellular telephone (known as the mobile
26 directory number or MDN), and the identifying telephone serial
27 number (Electronic Serial Number, or ESN), (Mobile Identification
28 Number, or MIN), (International Mobile Subscriber Identity, or

1 IMSI), or (International Mobile Equipment Identity, or IMEI) are
2 important evidence because they reveal the service provider, allow
3 us to obtain subscriber information, and uniquely identify the
4 telephone. This information can be used to obtain toll records, to
5 identify contacts by this telephone with other cellular telephones
6 used by co-conspirators, to identify other telephones used by the
7 same subscriber or purchased as part of a package, and to confirm if
8 the telephone was contacted by a cooperating source.

- 9 ii. The stored list of recent received, missed, and sent calls is important
10 evidence. It identifies telephones recently in contact with the
11 telephone user. This is valuable information in a drug investigation
12 because it will identify telephones used by other members of the
13 organization, such as suppliers, distributors and customers, and it
14 confirms the date and time of contacts. If the user is under
15 surveillance, it identifies what number he called during or around the
16 time of a drug transaction or surveilled meeting. Even if a contact
17 involves a telephone user not part of the conspiracy, the information
18 is helpful (and thus is evidence) because it leads to friends and
19 associates of the user who can identify the user, help locate the user,
20 and provide information about the user. Identifying a defendant's
21 law-abiding friends is often just as useful as identifying his drug-
22 trafficking associates. The information is also valuable in the
23 firearms context because it will identify telephones used by other
24 individuals who are part of illegal firearms transactions, and confirm
25 the date and time of contacts.
26 iii. Stored text messages are important evidence, similar to stored
27 numbers. Agents can identify both drug associates, and friends of the
28

1 user who likely have helpful information about the user, his location,
2 and his activities.

- 3 iv. Photographs on a cellular telephone are evidence because they help
4 identify the user, either through his or her own picture, or through
5 pictures of friends, family, and associates that can identify the user.
6 Pictures also identify associates likely to be members of the drug
7 trafficking organization. Some drug dealers photograph groups of
8 associates, sometimes posing with weapons and showing identifiable
9 gang signs. Also, digital photos often have embedded “geocode” or
10 GPS information embedded in them. Geocode information is
11 typically the longitude and latitude where the photo was taken.
12 Showing where the photo was taken can have evidentiary value. This
13 location information is helpful because, for example, it can show
14 where coconspirators meet, where they travel, and where assets
15 might be located. Based on my training and experience in
16 investigating numerous firearms possession and trafficking offenses,
17 I am aware that when individuals who are prohibited from legally
18 possessing firearms seek to acquire firearms, they typically seek to
19 obtain the firearms from private sellers. A common way in which
20 these types of private firearm sales, also referred to as “street sales,”
21 are transacted is via electronic communications such as text
22 message, email, and/or telephone calls. I know that cell phones are
23 frequently used to arrange such transactions because of the
24 flexibility and mobility they offer. I am further aware that when
25 individuals are offering items of value for sale, such as firearms, it is
26 common for them to take a photograph of the item and send it via
27 text message or email to an interested party for their review, or to
28 take a photograph of it to post/advertise it via social media or the

1 internet. During numerous investigations of firearms sales, I have
2 found it to be common for buyer's or seller's cell phones to contain
3 photographs of the firearms that were bought or sold.

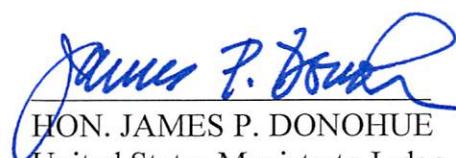
4 v. Stored address records are important evidence because they show the
5 user's close associates and family members, and they contain names
6 and nicknames connected to phone numbers that can be used to
7 identify suspects.

8 **CONCLUSION**

9 35. Based on the foregoing, I respectfully submit that there is probable cause to
10 search the **SUBJECT DEVICE**, more fully described in Attachment A, for evidence,
11 fruits, and instrumentalities of the crimes of felon in possession of a firearm, in violation
12 of Title 18, United States Code, Section 922(g)(1), and distribution and possession with
13 intent to distribute controlled substances in violation of Title 21, United States Code,
14 Sections 841(a)(1), as further described in Attachment B.

15
16
17 
18 _____
19 Gregory Heller, Special Agent
20 Alcohol, Tobacco, Firearms, and
21 Explosives (ATF)

22
23 Subscribed and sworn before me this 28th day of November, 2018.
24
25
26
27
28

23 
24 _____
25 HON. JAMES P. DONOHUE
26 United States Magistrate Judge

ATTACHMENT A

Subject Device to Be Searched

The **SUBJECT DEVICE** is a black and blue LG brand Model LM-X212TA cellular phone with serial number 804CYYQ025962 and IMEI number 356351-09-025962-0 that was associated with phone number 206-822-5522. The **SUBJECT DEVICE** was entered into Seattle Police Department evidence as tag number 830840-3 and later transferred to ATF Evidence under case 787095-19-0010 as Item #0004.

The **SUBJECT DEVICE** is currently in the custody of ATF and is secured in the ATF Seattle V Field Office evidence vault in Seattle, Washington.

With respect to the **SUBJECT DEVICE**, the authority to search includes both the device itself and any associated SIM card, SD card, or other similar storage device found within **SUBJECT DEVICE** at the time of its seizure on August 3, 2018.

ATTACHMENT B

Items to be Seized

From the **SUBJECT DEVICE** described in Attachment A of this warrant, the government is authorized to search for and seize the following items, which are evidence and/or fruits of the commission of the following crimes: felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1), and distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1):

- a. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- b. Stored list of recent received, sent, and missed calls;
- c. Stored contact information;
- d. Stored photographs depicting controlled substances, currency, drug packaging material, firearms, or other evidence of drug trafficking, and/or which tend to identify the user of the phone or suspected co-conspirators, including any metadata such as embedded GPS data associated with those photographs; and
- e. Stored text or chat messages related to possession or distribution of controlled substances and possession or transfer of firearms, or which tend to identify the user of the phone or suspected co-conspirators, including TextNow, SnapChat, WhatsApp, or other similar messaging and social media services where the data is stored on the telephone.